

February 2, 2010

Via Electronic Filing

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: *International Comparison and Consumer Survey Requirements in the Broadband Data Improvement Act*, GN Docket No. 09-47;

A National Broadband Plan for Our Future, GN Docket No. 09-51;

Inquiry Concerning the Deployment of Advanced Telecommunications Capability to All Americans in a Reasonable and Timely Fashion, GN Docket No. 09-137

Dear Ms. Dortch:

On behalf of myself and my coauthors, I submit for the record the attached research paper, titled “**Increasing Spectrum for Broadband: What Are The Options?**”. In this report, we discuss reforms which would allow for better utilization of our nation’s vital spectrum resources. Because mobile wireless access is playing a crucial role in the advancement of broadband services in the United States, proposals regarding spectrum policy should be of importance to the Commission’s forthcoming National Broadband Plan. We hope the Commission’s staff finds our report useful.

Sincerely,



Thomas M. Lenard
President and Senior Fellow